

ELIZABETH M. PIPKIN (243611)
ANN M. RAVEL (62139)
McMANIS FAULKNER
50 West San Fernando Street, 10th Floor
San Jose, CA 95113
Telephone: (408) 279-8700
Facsimile: (408) 279-3244
epipkin@mcmmanislaw.com
aravel@mcmmanislaw.com

MARC A. WALLENSTEIN (*pro hac vice*)
GEORGE A. ZELCS (*pro hac vice*)
RYAN Z. CORTAZAR (*pro hac vice*)
CHAD E. BELL (*pro hac vice*)
KOREIN TILLERY LLC
205 North Michigan Avenue, Suite 1950
Chicago, IL 60601
Telephone: (312) 641-9750
Facsimile: (312) 641-9751

GLEN E. SUMMERS (176402)
KARMA M. GIULIANELLI (184175)
LINDLEY J. BRENZA (*pro hac vice*)
JONATHAN JACOB MARSH (*pro hac vice*)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Telephone: (303) 592-3100

CAROL L. O'KEEFE (*pro hac vice*)
MICHAEL E. KLENOV (277028)
KOREIN TILLERY LLC
505 North Seventh Street, Suite 3600
St. Louis, MO 63101
Telephone: (314) 241-4844
Facsimile: (314) 241-3525

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,
MICK CLEARY, EUGENE ALVIS, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**DECLARATION OF JOSEPH TAYLOR
IN SUPPORT OF PLAINTIFFS' MOTION
TO CERTIFY CLASS UNDER FED. R.
CIV. P. 23(b)(2) AND 23(b)(3)**

Date: July 1, 2025

Time: 10:00 a.m.

Judge: Hon. Virginia K. DeMarchi

1 I, Joseph Taylor, declare:

2 1. I make this declaration in support of Plaintiffs' Motion to Certify Class Under Fed.
3 R. Civ. P. 23(b)(2) and 23(b)(3), to be filed on March 11, 2025. I have personal knowledge of each
4 fact stated in the declaration and, if called as a witness, I could and would competently testify
5 thereto.

6 2. I lived in the United States—and specifically, in the state of Illinois—during the
7 proposed class period, which I understand is from November 12, 2017 to the present.

8 3. I bought and used Android devices—including but not limited to, a Samsung
9 Galaxy A25 and a Samsung Galaxy A14—during the proposed class period.

10 4. My phones ran a Google-licensed version of the Android operating system, with
11 Google Play Services installed, and were associated with a Google account.

12 5. I purchased cellular data from carriers Xfinity, Metro by T-Mobile, and AT&T
13 during the proposed class period. Attached as Exhibit A is an example of one of my monthly bills
14 from Metro by T-Mobile.

15 6. I regularly used the cellular data that I purchased from Xfinity, Metro by T-Mobile,
16 and AT&T by using my Android devices to connect to the cellular networks provided by those
17 carriers.

18 7. I did not know that Google was using my cellular data for its own purposes and
19 benefit. I had no knowledge that such transfers were occurring.

20 8. I did not give Google permission to use my cellular data for its own purposes and
21 benefit, and I would have expected Google to notify me and obtain my permission before doing
22 so.

23 9. If I had known that Google was using my cellular data for its own purposes and
24 benefit, and that it was doing so without my permission, I would have expected Google to
25 compensate me for the cellular data that it used.
26
27
28

1 10. I am seeking to be appointed a representative of the proposed class of United States
2 residents who used mobile phones running Google's Android operating system with a cellular data
3 plan during the proposed class period.

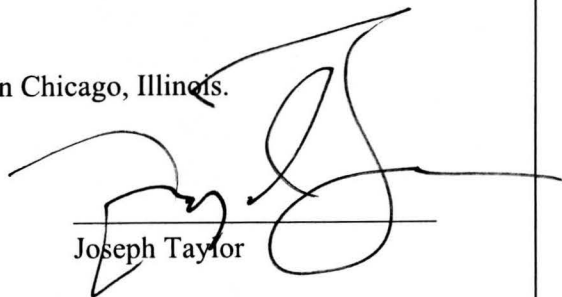
4 11. To the best of my knowledge, I do not have any interests relevant to this case that
5 conflict with the class members I seek to represent. I am seeking the relief provided under United
6 States and California law for myself and for all class members during the proposed class period. I
7 have not been promised any personal financial benefit for participating in this lawsuit. I am serving
8 as a class representative in order to further the interests of Android device users and to remedy
9 Google's misconduct. I have acted and will continue to act in the interests of those class members
10 and place their interests on par with my own.

11 12. I have been actively involved in the prosecution of the litigation to date and have
12 worked closely with my attorneys throughout the course of these proceedings in order to
13 adequately represent the interests of the class members. My participation has included conferring
14 with attorneys regarding the status of the case, reviewing complaints and other pleadings,
15 responding to discovery requests, searching for and producing documents, and preparing and
16 sitting for my deposition.

17 13. The attorneys representing me in this case from the law firms Korein Tillery, LLC
18 and Bartlit Beck LLP have done so in a professional and competent manner, and they have kept
19 me informed about the progress of this case throughout this litigation.

20 14. I declare under penalty of perjury that the foregoing is true and correct.

21
22 Executed this 28th day of February 2025 in Chicago, Illinois.

23
24
25 
26 Joseph Taylor
27
28

Exhibit

A

ACCOUNT INFORMATION

Account Name	JOSEPH TAYLOR
Account Number	FRCP 5.2 PII Redaction
Phone Number	MULTIPLE SERVICES
	PAGE 1

ACCOUNT SUMMARY

Previous Balance	60.00
Payment Received	-60.00
Balance Forward	0.00
Total Adjustments	0.00
Total Current Charges	60.00
TOTAL AMOUNT DUE	60.00

Metro by T-Mobile
PO Box 601119
DALLAS, TX 75360-1119

Account Number	FRCP 5.2 PII Redaction
Phone Number	MULTIPLE SERVICES
Statement Date	03/01/21
Due Date	03/01/21
Amount Due	60.00
AMOUNT PAID	

Metro by T-Mobile PAYMENTS
PO Box 5119
CAROL STREAM, IL 60197-5119

FRCP 5.2 PII Redaction

**ACCOUNT INFORMATION**

Account Name	JOSEPH TAYLOR
Account Number	[REDACTED]
Phone Number	MULTIPLE SERVICES
	PAGE 2

FOR INQUIRIES CALL CUSTOMER SERVICE AT 1 - 888 - 8METRO8 OR *611

SUMMARY OF CHARGES THRU 03/01/21

Previous Balance.....	60.00
-----------------------	-------

Payment Detail

02/04/21 [REDACTED] Single Purchase.....	-60.00
Total Payments Received Through 02/28/21.....	-60.00
Balance Forward.....	0.00

Account level Adjustments.....	0.00
Subscriber Adjustments.....	0.00
Total Adjustments.....	0.00

Account level Charges.....	0.00
Subscriber Charges.....	59.79

Government Taxes & Fees

Chicago City-IL Prepaid 911 Fee / ITAC	0.07
Chicago City-IL Telecom Excise Tax	0.07
Chicago City-Local Telecom Excise Tax	0.07
Total Current Charges.....	60.00

Total Amount Due by 03/01/21.....	60.00
--	--------------



ACCOUNT INFORMATION

Account Name	JOSEPH TAYLOR
Account Number	[REDACTED]
Phone Number	MULTIPLE SERVICES

PAGE 3

CELLULAR SERVICE

MONTHLY CHARGES FOR [REDACTED]

MONTHLY SERVICE 03/01 --> 03/31 Tablet Unlimited SD PROMO.....	10.00
Total Monthly Charges.....	10.00

MONTHLY CHARGES FOR [REDACTED]

MONTHLY SERVICE 03/01 --> 03/31 \$50 UNL LTE + Google One.....	50.00
Total Monthly Charges.....	50.00